

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthome, Governor C. Stephen Alfred, Director

December 17, 2002

Certified Mail No. 7000 1670 0013 9128 9714

Gary Pool, Plant Manager The Amalgamated Sugar Co. LLC P.O. Box 127 Twin Falls, ID 83303-0127

RE:

AIRS Facility No. 083-00001, The Amalgamated Sugar Co. LLC (TASCO), Twin Falls

Final Tier I Operating Permit

Dear Mr. Pool:

The Department of Environmental Quality (Department) is issuing Tier I Operating Permit No. 083-00001 to TASCO's facility in Twin Falls, in accordance with IDAPA 58.01.01.300 - 386. The enclosed permit is effective immediately and is based on the information contained in your permit application, received May 31, 1995.

Steve VanZandt of the Twin Falls Regional Office will contact you regarding a meeting to discuss the permit terms and requirements. The Department recommends the following representatives attend this meeting: your facility's plant manager, responsible official, environmental contact, and any operations staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of the decision. However, prior to filing a petition for a contested case, the Department encourages you to contact Bill Rogers at (208) 373-0502 or wrogers@deq.state.id.us to discuss any questions or concerns you may have with the enclosed permit.

Sincerela

Katherine B. Kelly Administrator

Air Quality Division

KK/cpr Project No. T1-9505-063-1 G:\

G:\Air Quality\Stationary Source\SS Ltd\T1\TASCO Twin\Final\T1-9505-063-1 Final PL.doc

Enclosures

CC:

Sherry Davis, Air Quality Division
Steve VanZandt, Twin Falls Regional Office

Laurie Kral, EPA Region 10



Air Quality

TIER I OPERATING PERMIT

PERMIT NO.: 083-00001

AQCR: 063 CLASS:

SIC:

2063

ZONE:

State of Idaho **Department of Environmental Quality**

UTM COORDINATE (km):

710.0, 4721.0

12

1. PERMITTEE

The Amalgamated Sugar Company, LLC - Twin Falls Factory

PROJECT

Tier I operating permit

	to tobolomis bound			
3.	MAILING ADDRESS	CITY	STATE	ZIP
	P.O. Box 127	Twin Falls	ID	83303-0127
4.	FACILITY CONTACT	TITLE	TELEPHONE	
	Gary Pool	Plant Manager	(208) 773-410	04
5.	RESPONSIBLE OFFICIAL	TITLE	TELEPHONE	
	Gary Pool	Plant Manager	(208) 773-410	04
6.	EXACT PLANT LOCATION		COUNTY	
	2320 Orchard Drive, Twin Falls, Idaho		Twin Falls	

GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Beet-sugar manufacturing

PERMIT AUTHORITY

This Tier I operating permit is issued pursuant to Idaho Code §39-115 and the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.300 - 386. The permittee shall comply with the terms and conditions of this permit.

This permit incorporates all applicable terms and conditions of prior air quality permits issued by the Department of Environmental Quality for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210, and the permittee elects not to incorporate those terms and conditions into this operating permit.

The effective date of this permit is the date of signature by the Department on the cover page.

KATHERINE'B. KELLY, ADMINISTRATOR, AIR QUALITY DIVISION

DATE ISSUED:

December 17, 2002

DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE EXPIRES:

December 17, 2005

SO:KK/tk

Project No. T1-9505-063-1 G:\Air Qualify\Stationary Source\SS Ltd\T1\TASCO Twin\Final\T1-9505-063-1 Final Permit.doc

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LIST OF ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR Air Quality Control Region

ASTM American Society of Testing and Materials

Btu/lb British thermal units per pound

CAA Clean Air Act
CaO calcium oxide

CFR Code of Federal Regulations

CO carbon monoxide CO₂ carbon dioxide

Department Department of Environmental Quality

dscf dry standard cubic foot

EPA U.S. Environmental Protection Agency

gpm gallons per minute

gr grain (1 lb = 7,000 grains)

gr/dscf grains per dry standard cubic foot

IDAPA a numbering designation for all administrative rules in Idaho promulgated in accordance with the

Idaho Administrative Procedures Act

km kilometer

ib/dscf pounds per dry standard cubic foot

lb/hr pounds per hour

Ib/MMBtu pounds per million British thermal units

MMBtu/hr million British thermal units per hour

NO_x nitrogen oxides

NSPS New Source Performance Standards

O₂ oxygen

O&M operation and maintenance

ppm parts per million
PM particulate matter

PM₁₀ particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

PTC permit to construct
PW process weight

SIC Standard Industrial Classification

SIP State Implementation Plan

SO₂ sulfur dioxide

TASCO The Amalgamated Sugar Company

T/yr tons per year (1 T = 2,000 lb)

U.S.C. United States Code

UTM Universal Transverse Mercator

VOC volatile organic compound

Permittee: The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1. FACILITY-WIDE CONDITIONS

The following table contains a summary of requirements that apply generally to emissions units at the facility.

Table 1.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.1	Fugitive emissions	Reasonable control	IDAPA 58.01.01.651	1.2, 1.3, 1.4, 1.11
1.5	Odor	Reasonable control	IDAPA 58.01.01.775-776	1.6, 1.11
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 1.11
1.9	Excess emissions	Compliance with IDAPA 58.01.01.130- 136	IDAPA 58.01.01.130-136	1.9-1.9.5, 1.11
1.12	Open burning	Compliance with IDAPA 58.01.01.600-616	IDAPA 58.01.01.600-616	1.11
1.13	Renovation or demolition	Compliance with 40 CFR 61, Subpart M	40 CFR 61, Subpart M	1.11
1.14	Chemical accidental release	Compliance with 40 CFR 68	40 CFR 68	1.11
1.15	Air quality standards	EPA reference test methods	IDAPA 58.01.01.157	1.11, 1.20
1.16, 1.17	Fuel-burning equipment	Grain-loading	IDAPA 58.01.01.676-677	1.11
1.18	Fuel sulfur content limit	ASTM grade No. 1 fuel oil - 0.3% by weight or less; ASTM grade No. 2 fuel oil - 0.5% by weight or less	IDAPA 58.01.01.728	1.18.1, 1.11
1,19		Any coal - 1% by weight or less	IDAPA 58.01.01.729	1.19.1, 1.11
1.20	Criteria air pollutants, opacity	Compliance testing	IDAPA 58.01.01.157	1.11, 1.15

Fugitive Emissions

1.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651.

[IDAPA 58.01.01.650-651, 5/1/94]

1.2 The permittee shall monitor and maintain records of the frequency and method(s) used (i.e., water, chemical emissions suppressants, etc.) to reasonably control fugitive emissions.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

1.3 The permittee shall maintain records of all fugitive emissions complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permittee: The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location: Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions, to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions are present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

Odors

1.5 No person shall allow, suffer, cause or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

[IDAPA 58.01.01.775-776, 5/1/94]

The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Visible Emissions

1.7 No person shall discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, nitrogen oxides, and/or chlorine gases is the only reason for the failure of the emission to comply with the requirements of this section.

[IDAPA 58.01.01.625, 4/5/00]

In addition to the specific requirements in Permit Conditions 2.26, 2.41, 3.9, and 5.6, the permittee shall conduct a monthly facility-wide inspection of all potential sources of visible emissions during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each monthly visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

[IDAPA 58.01.01.322.06, 07 (state-only), 5/1/94]

Permittee:

The Amalgamated Sugar Company, LLC

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Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Excess Emissions

1.9 In addition to the specific requirements in Permit Condition 2.6, 2.13, and 2.14 the permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions. The provisions of IDAPA 58.01.01.130-136 shall govern in the event of conflicts between Permit Condition 1.9 and the regulations of IDAPA 58.01.01.130-136.

1.9.1 The person responsible for or in charge of a facility during an excess emissions event shall, with all practicable speed, initiate and complete appropriate and reasonable action to correct the conditions causing the excess emissions events, to reduce the frequency of occurrence of such events, and to minimize the amount by which the emission standard is exceeded. In addition, this person shall, as provided below or upon request of the Department, submit a full report of such occurrence including a statement of all known causes and of the scheduling and nature of the actions to be taken.

[IDAPA 58.01.01.132, 4/5/00]

1.9.2 In all cases where startup, shutdown, or scheduled maintenance of any equipment or emissions unit is expected to result or results in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA 58.01.01.133.01(a) through (d), including, but not limited to:

[IDAPA 58.01.01.133, 4/5/00]

Prohibiting any scheduled startup, shutdown, or maintenance resulting in excess emissions during any
period in which an Atmospheric Stagnation Advisory and/or a Wood Stove Curtailment Advisory has been
declared by the Department.

[IDAPA 58.01.01.133.01.a, 3/20/97]

Notifying the Department of an excess emissions event as soon as reasonably possible, but no later than
two hours prior to the start of the excess emissions event unless the owner or operator demonstrates to
the Department's satisfaction that a shorter advanced notice was necessary.

[IDAPA 58.01.01.133.01.b, 4/5/00]

 Reporting and recording the information required pursuant to Permit Conditions 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event due to startup, shutdown, or scheduled maintenance.

[IDAPA 58.01.01.133.01.c, 3/20/97]

1.9.3 In all cases where upset or breakdown of equipment or an emissions unit, or the initiation of safety measures, results or may result in an excess emissions event, the owner or operator of the facility or emissions unit generating the excess emissions shall demonstrate compliance with IDAPA58.01.01.134.01(a) and (b) and the following:

[IDAPA 58.01.01.134, 4/5/00]

1.9.3.1 For all equipment or emissions units from which excess emissions result during upset or breakdown conditions, or for other situations that may necessitate the implementation of safety measures that cause excess emissions, the facility owner or operator shall comply with the following:

[IDAPA 58.01.01.134.02, 4/5/00]

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

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Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

The owner or operator shall immediately undertake all appropriate measures to reduce and, to the extent
possible, eliminate excess emissions resulting from the event and to minimize the impact of such excess
emissions on the ambient air quality and public health.

[IDAPA 58.01.01.134.02.a, 4/5/00]

• The owner or operator shall notify the Department of any upset, breakdown, or safety event that results in __excess emissions. Such_notification shall identify the time, specific location, equipment or emissions unit involved, and (to the extent known) the cause(s) of the occurrence. The notification shall be given as soon as reasonably possible, but no later than 24 hours after the event, unless the owner or operator demonstrates to the Department's satisfaction that the longer reporting period was necessary.
[IDAPA 58.01.01.134.02.b, 4/5/00]

The owner or operator shall report and record the information required pursuant to Permit Conditions
 1.9.4 and 1.9.5 and IDAPA 58.01.01.135 and 136 for each excess emissions event caused by an upset, breakdown, or safety measure.

[IDAPA 58.01.01.134.02.c, 3/20/97]

1.9.3.2 During any period of excess emissions caused by upset, breakdown, or operation under facility safety measures, the Department may require the owner or operator to immediately reduce or cease operation of the equipment or emissions unit causing the excess emissions until such time as the condition causing the excess emissions has been corrected or brought under control. Such action by the Department shall be taken upon consideration of the factors listed in IDAPA 58.01.01.134.03 and after consultation with the facility owner or operator.

[IDAPA 58.01.01.134.03, 4/5/00]

1.9.4 The owner or operator shall submit a written report for each excess emissions event to the Department no later than 15 days after the beginning of such an event. Each report shall contain the information specified in IDAPA 58.01.01.135.02.

[IDAPA 58.01.01.135.01, 02, 3/20/97; IDAPA 58.01.01.135.03, 4/5/00]

1.9.5 The owner or operator shall maintain excess emissions records at the facility for the most recent five-calendar-year period. The excess emissions records shall be made available to the Department upon request. The excess emissions records shall include the information required by IDAPA 58.01.01.136.03(a) and (b), as summarized in the following:

[IDAPA 58.01.01.136.01, 02, 3/20/97; IDAPA 58.01.01.136.03, 4/5/00]

 An excess emissions record book for each emissions unit or piece of equipment containing copies of all reports that have been submitted to the Department pursuant to IDAPA 58.01.01.135 for the particular emissions unit or equipment; and

[IDAPA 58.01.01.136.03.a, 4/5/00]

Copies of all startup, shutdown, and scheduled maintenance procedures and upset, breakdown, or safety
preventative maintenance plans that have been developed by the owner or operator in accordance with
IDAPA 58.01.01.133 and 134, and facility records as necessary to demonstrate compliance with such
procedures and plans.

[IDAPA 58.01.01.136.03.b, 3/20/97]

Permittee: The Amalgamated Sugar Company, LLC

The Amalgamated Sugar Company, LLC Twin Falls, Idaho

Date Issued: Date Expires: December 17, 2002 December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Reports and Certifications

Location:

All periodic reports and certifications required by this permit shall be submitted to the Department within 45 days of the end of each specified reporting period. Excess emissions reports and notifications shall be submitted in accordance with IDAPA 58.01.01.130-136. The annual reporting period for the permittee starts on September 1 of each year and ends on August 31 of the next calendar year. The semiannual reporting periods for the permittee will be September 1 through February 28 (or 29 in a leap year) and March 1 through August 31. Reports, certifications, and notifications shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Twin Falls Regional Office
601 Pole Line Rd., Suite 2
Twin Falls, ID 83301
Phone: (208) 736-2190

Fax: (208) 736-2194

The periodic compliance certification required by General Provision 13.21 shall also be submitted within 45 days of the end of the specified reporting period to the following address:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Ave.
Seattle, WA 98101

[IDAPA 58.01.01.322.08, 11, 5/1/94]

Monitoring and Recordkeeping

conditions of this operating permit. Recording of monitoring information shall include, but not be limited to:
(a) the date(s), place(s), and times of sampling or measurements; (b) the date(s) analyses were performed;
(c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Support information shall include, but not be limited to, all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available to Department representatives upon request in either hard copy or electronic format.

The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and

[IDAPA 58.01.01.322.07, 5/1/94]

Open Burning

1.11

1.12 The facility shall comply with the requirements of IDAPA 58.01.01.600-616, Rules for Control of Open Burning.

[IDAPA 58.01.01.600-616, 5/1/94]

Permittee:

The Amaigamated Sugar Company, LLC

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Date Expires:

December 17, 2005

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Renovation and Demolition

1.13 The permittee shall comply with all applicable portions of 40 CFR 61, Subpart M when conducting any renovation or demolition activities at the facility.

[40 CFR 61, Subpart M]

Regulated Substance for Accidental Release Prevention

- 1.14 An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, shall comply with the requirements of the Chemical Accident Prevention Provisions of 40 CFR 68 no later than the latest of the following dates:
 - Three years after the date on which a regulated substance present above a threshold quantity is first listed under 40 CFR 68.130.
 - The date on which a regulated substance is first present above a threshold quantity in a process.

[40 CFR 68.10 (a)]

Test Methods

1.15 If testing is required, the permittee shall use the test methods listed in Table 1.2 to measure the pollutant emissions.

Table 1.2 EPA Reference Test Methods

Pollutant	Test Method*	Special Conditions
PM ₁₀	EPA Method 201.a and Method 202	
PM	EPA Method 5	
NO _x	EPA Method 7	
SO₂	EPA Method 6	
СО	EPA Method 10	
voc	EPA Method 25	
Opacity	EPA Method 9	If an NSPS source, IDAPA 58.01.01.625 and Method 9; otherwise, IDAPA 58.01.01.625 only.

^{*}or a Department-approved alternative in accordance with IDAPA 58.01.01.157

Permittee:

The Amalgamated Sugar Company, LLC

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Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Fuel-Burning Equipment

1.16 No person shall not discharge to the atmosphere from any fuel-burning equipment with a maximum rated input of 10 MMBtu/hr or more, and commencing operation on or after October 1, 1979, PM in excess of the concentrations shown in the following table:

Table 1.3 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS FOR NEW SOURCES

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.050	8%
Wood Product	.080	. 8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.676, 5/1/94]

1.17 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in the following table:

Table 1.4 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS FOR MINOR AND EXISTING SOURCES

Fuel Type	Allowable Particulate (gr/dscf)	Oxygen
Gas	.015	3%
Liquid	.050	3%
Coal	.100	8%
Wood Product	.200	8%

The effluent gas volume shall be corrected to the oxygen concentration shown.

[IDAPA 58.01.01.677, 5/1/94]

Sulfur Content

- 1.18 No person shall sell, distribute, use, or make available for use any distillate fuel oil containing more than the following percentages of sulfur:
 - ASTM Grade No. 1 fuel oil 0.3% by weight
 - ASTM Grade No. 2 fuel oil 0.5% by weight

[IDAPA 58.01.01.728, 5/1/94]

1.18.1 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of distillate fuel oil received. The documentation must identify the supplier of the fuel, the date of fuel delivery, the grade of distillate fuel, and the sulfur content in percent by weight.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Twin Falls, Idaho Location:

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

1.19 No person shall sell, distribute, use, or make available for use any coal containing greater than 1% sulfur by weight.

[IDAPA 58.01.01.729, 5/1/94; Permit No. 13-1020-0001-00, 3/19/81]

1.19.1 The permittee shall maintain documentation of the actual sulfur content in percent by weight for each shipment of coal received. The documentation must identify the supplier of the coal, the date of delivery, and the coal sulfur content in percent by weight.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Compliance Testing

1.20 The permittee shall provide a notice of intent to test to the Department at least 15 days prior to the scheduled test unless a shorter time period has been provided in a permit, order, or consent decree, or the permittee has prior Department approval. The Department may, at its option, have an observer present at any emissions tests conducted on a source. The Department requests that such testing not be performed on weekends or state holidays.

All testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior Department approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by the Department for any testing deviations, the Department may determine that the testing does not satisfy the testing requirements. Therefore, prior to conducting any compliance test, the permittee is encouraged to submit in writing to the Department, at least 30 days in advance, the following for approval:

- . The type of test method to be used
- Any extenuating or unusual circumstances regarding the proposed test
- The proposed schedule for conducting and reporting the test

Within 30 days following the date on which a compliance test required by this permit is concluded, the permittee shall submit to the Department a compliance test report for the respective test. The compliance test report shall include all process operating data collected during the test period as well as the test results, raw test data, and associated documentation, including any approved test protocol.

The proposed test date(s), test date rescheduling notice(s), compliance test report(s), and all other correspondence shall be sent to the following address:

Air Quality Permit Compliance **Department of Environmental Quality** Twin Falls Regional Office 601 Pole Line Rd., Suite 2 Twin Falls, ID 83301

Phone: (208) 736-2190 (208) 736-2194 Fax:

[IDAPA 58.01.01.157, 11/13/98; IDAPA 58.01.01.322.06, 08.a, 09. 5/1/94]

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

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December 17, 2005

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2. EMISSIONS UNIT GROUP 1: FOSTER WHEELER COAL-FIRED BOILER (S-B1)

Summary Description

The following paragraph and Table 2.1 are a narrative description of the Foster Wheeler coal-fired boiler regulated in this Tier I operating permit. These descriptions are for informational purposes only.

With a maximum operational capacity of 220,000 pounds of steam per hour, the Foster Wheeler coal-fired boiler is used to provide steam for process(es) and electricity generation.

Table 2.1 describes the devices used in controlling emissions from the Foster Wheeler coal-fired boiler.

Table 2.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Point identification	- Emissions Unit(s)/ Process(es) -	Emission Control Device
P-B1	Foster Wheeler coal-fired boiler, (S-B1)	Baghouse (A –B1)

Table 2.2 contains a summary of requirements that apply generally to the Foster Wheeler coal-fired boiler. Specific permit requirements are listed below Table 2.2.

Table 2.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
2.1	Visible emissions	20% opacity except for 27% or less for one six- minute period per hour	40 CFR 60.42(a)(2)	40 CFR 60.07 40 CFR 60.08
	PM	0.1 lb/MMBtu	40 CFR 60.42(a)(1);	40 CFR 60.11 40 CFR 60.13
2.2	SO₂	1.2 lb/MMBtu	40 CFR 60.42(a)(2); Permit No. 13-1480- 0001-01	40 CFR 60.45.a 40 CFR 60.45.c.1,2,3,4 40 CFR 60.45.e.1
2.3	NO _x	0.7 lb/MMBtu	40 CFR 60.44(a)(3); Permit No. 13-1480- 0001-01	40 CFR 60.45.f.1,2,3,4,5 40 CFR 60.45.g.1,2,3 40 CFR 60.43.a,b,d (2.4 – 2.38)
2.40	PM	0.100 gr/dscf at 8% O ₂	IDAPA 58.01.01.677; Permit No. 13-1020- 0001-00	2.44, 1.11
2.41	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1020- 0001-00	1.8, 1.11
2.43	Baghouse pressure drop	1.0-10.0 inches of water	IDAPA 58.01.01.322.0607	2.44, 1.11

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

New Source Performance Standards 40 CFR 60, Subpart D

2.1 On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of 40 CFR 60, Subpart D shall cause to be discharged to the atmosphere from any affected facility any gases which:

[40 CFR 60.42(a)]

Contain PM in excess of 43 nanograms per joule (ng/J) heat input (0.10 lb/MMBtu) derived from fossil fuel or fossil fuel and wood residue.

[40 CFR 60.42(a)(1)]

- Exhibit greater than 20% opacity, except for one six-minute period per hour of not more than 27% opacity. [40 CFR 60:42(a)(2)]
- On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, 2.2 no owner or operator subject to the provisions of 40 CFR 60, Subpart D shall cause to be discharged to the atmosphere from any affected facility any gases which contain sulfur dioxide in excess of 520 ng/J heat input (1.2 lb/MMBtu) derived from solid fossil fuel.

[40 CFR 60.43(a)(2); Permit No. 13-1480-0001-01, 3/19/81]

- 2.3 On and after the date on which the performance test required to be conducted by 40 CFR 60.8 is completed, no owner or operator subject to the provisions of 40 CFR 60, Subpart D shall cause to be discharged to the atmosphere from any affected facility any gases which contain nitrogen oxides, expressed as nitrogen dioxide, in excess of 300 nanograms per joule heat input (0.70 lb/MMBtu) derived from solid fossil fuel, I40 CFR 60.44(a)(3); Permit No. 13-1480-0001-01, 3/19/811
- Each owner or operator shall install, calibrate, maintain, and operate continuous monitoring systems for 2.4 measuring the opacity of emissions, SO₂ emissions, NO_x emissions, and either O₂ or CO₂ except as provided in paragraph (b) of 40 CFR 60.45.

[40 CFR 60.45(a); Permit No. 13-1480-0001-01, 3/19/811

2.5 For performance evaluations under 40 CFR 60.13(c) and calibration checks under 40 CFR 60.13(d), the following procedures shall be used:

[40 CFR 60.45(c)]

Methods 6, 7, and 3B of Appendix A to 40 CFR 60, as applicable, shall be used for the performance evaluations of SO₂ and NO_x continuous monitoring systems. Acceptable alternative methods for Methods 6, 7, and 3B are listed in 40 CFR 60.46(d).

[40 CFR 60.45(c)(1)]

As applicable, SO₂ or nitric oxide shall be used for preparing calibration gas mixtures under Performance Specification 2 of Appendix B to 40 CFR 60.

[40 CFR 60.45(c)(2)]

For affected facilities burning fossil fuel(s), the span value for a continuous monitoring system measuring the opacity of emissions shall be 80, 90, or 100%. For a continuous monitoring system measuring SO_x or NO_x, the span value shall be 1,500 ppm or 1,000 ppm, respectively.

[40 CFR 60.45(c)(3)]

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All span values computed under paragraph (c)(3) of 40 CFR 60.45 for burning combinations of fossil fuels shall be rounded to the nearest 500 ppm.

[40 CFR 60.45(c)(4)]

For any continuous monitoring system installed under 40 CFR 60.45(a), the following conversion
procedures shall be used to convert the continuous monitoring data into units of the applicable standards
(ng/J, lb/MMBtu):

[40 CFR 60.45(e)]

When a continuous monitoring system for measuring O₂ is selected, measurements of the pollutant and O₂ concentrations shall each be consistently made on a wet or dry basis. Alternative procedures approved by the Administrator shall be used when measurements are made on a wet basis. When measurements are made on a dry basis, the following conversion procedure shall be used:

 $E = CF[20.9/(20.9-\% O_2)]$

Where: E, C, F, and percent O₂ are determined using: 40 CFR 60.45(f) of 40 CFR 60.45.

[40 CFR 60.45(e)(1)]

• The values used in the equation under 40 CFR 60.45(e)(1) and Permit Condition 2.6.1 are derived as follows:

[40 CFR 60.45(f)]

(1) E = pollutant emissions, ng/J (lb/MMBtu).

[40 CFR 60.45(f)(1)]

(2) C = pollutant concentration, ng/dscm (lb/dscf), determined by multiplying the average concentration (ppm) for each one-hour period by 4.15 x 104 M ng/dscm per ppm (2.59 x 10 -9 M lb/dscf per ppm), where; M = pollutant molecular weight, g/g-mole (lb/lb-mole). M=64.07 for sulfur dioxide and 46.01 for nitrogen oxides.

[40 CFR 60.45(f)(2)]

(3) Percent O_2 , percent $CO_2 = O_2$ or CO_2 volume (expressed as percent), determined with equipment specified under 40 CFR 60.45(a).

[40 CFR 60.45(f)(3)]

- (4) F, F_c = a factor representing a ratio of the volume of dry flue gases generated to the calorific value of the fuel combusted (F), and a factor representing a ratio of the volume of carbon dioxide generated to the calorific value of the fuel combusted (F_c), respectively. Values of F and F_c are given as follows:
 [40 CFR 60.45(f)(4)]
- (5) For sub-bituminous and bituminous coal as classified according to ASTM D388-77 (incorporated by reference—see 40 CFR 60.17), F=2.637 x 10⁻⁷ dscm/J (9,820 dscf/MMBtu) and F_c=0.486 x 10⁻⁷ scm CO₂/J (1,810 scf CO₂/MMBtu).

[40 CFR 60.45(f)(4)(ii)]

(6) The owner or operator may use the equation in 40 CFR 60.45(f)(5) to determine an F factor (dscm/J or dscf/MMBtu) on a dry basis (if it is desired to calculate F on a wet basis, consult the Administrator) or F_c factor (scm CO₂/J, or scf CO₂/MMBtu) on either basis in lieu of the F or F_c factors specified in 40 CFR 60.45(f)(5).

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2.6 Excess emission and monitoring system performance (MSP) reports shall be submitted to the Administrator semiannually for each six-month period in the calendar year. All semiannual reports shall be postmarked by the 30th day following the end of each six-month period. Each excess emission and MSP report shall include the information required in 40 CFR 60.7(c). Periods of excess emissions and monitoring systems downtime that shall be reported are defined as follows:

[40 CFR 60.45(g); Permit No. 13-1480-0001-01, 3/19/81]

Excess emissions are defined as any six-minute period during which the average opacity of emissions
exceeds 20% opacity, except that one six-minute average per hour of up to 27% opacity need not be
reported.

[40 CFR 60.45(g)(1)]

Sulfur dioxide excess emissions for affected facilities are defined as:

Any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) of sulfur dioxide as measured by a continuous monitoring system exceed the applicable standard under 40 CFR 60.43.

[40 CFR 60.45(g)(2)]

Nitrogen oxides excess emissions for affected facilities are defined as:

Excess emissions for affected facilities using continuous monitoring systems for measuring nitrogen oxides are defined as any three-hour period during which the average emissions (arithmetic average of three contiguous one-hour periods) exceed the applicable standards under40 CFR 60.44.

[40 CFR 60.45(g)(3)]

2.7 In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use as reference methods and procedures the test methods in Appendix A of 40 CFR 60 or other methods and procedures as specified in 40 CFR 60.46, except as provided in 40 CFR 60.8(b). Acceptable alternative methods and procedures are given in 40 CFR 60.46(d).

[40 CFR 60.46(a)]

2.8 The owner or operator shall determine compliance with the PM, SO₂, and NO_x standards in 40 CFR 60.42, 60.43, and 60.44 as follows:

[40 CFR 60.46(b)]

2.8.1 The emission rate (E) of PM, SO₂, or NO_x shall be computed for each run using the following equation:

 $E = CF_d (20.9)/(20.9-\% 0_2)$

E = emission rate of pollutant, ng/J (lb/MMBtu)

C = concentration of pollutant, ng/dscm (lb/dscf)

 $%O_2 = O_2$ concentration, percent dry basis

F_d = factor as determined from Method 19

[40 CFR 60.46(b)(1)]

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2.8.2 Method 5 shall be used to determine the particular matter concentration (C) at affected facilities without wet flue-gas-desulfurization systems.

[40 CFR 60.46(b)(2)]

The sampling time and sample volume for each run shall be at least 60 minutes and 0.85 dscm (30 dscf).
 The probe and filter holder heating systems in the sampling train may be set to provide a gas temperature no greater than 160 ±14 °C (320±25 °F).

[40 CFR 60.46(b)(2)(i)]

The emission rate correction factor (integrated or grab sampling) and analysis procedure of Method 3B in Appendix A of 40 CFR 60 shall be used to determine the O₂ concentration (%O₂). The O₂ sample shall be obtained simultaneously with, and at the same traverse points as, the particulate sample. If the grab sampling procedure is used, the O₂ concentration for the run shall be the arithmetic mean of all the individual O₂ sample concentrations at each traverse point.

[40 CFR 60.46(b)(2)(ii)] -

If the particulate run has more than 12 traverse points, the O₂ traverse points may be reduced to 12 provided that Method 1 is used to locate the 12 O₂ traverse points.

[40 CFR 60.46(b)(2)(iii)]

2.8.3 Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity.

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[40 CFR 60.46(b)(3)]

2.8.4 Method 6 shall be used to determine the SO₂ concentration.

[40 CFR 60.46(b)(4)]

The sampling site shall be the same as that selected for the particulate sample. The sampling location in
the duct shall be at the centroid of the cross section or at a point no closer to the walls than one meter
(3.28 feet). The sampling time and sample volume for each sample run shall be at least 20 minutes and
0.020 dscm (0.71 dscf). Two samples shall be taken during a one-hour period, with each sample taken
within a 30-minute interval.

[40 CFR 60.46(b)(4)(i)]

• The emission rate correction factor, integrated sampling, and analysis procedure of Method 3B shall be used to determine the O₂ concentration (%O₂). The O₂ sample shall be taken simultaneously with, and at the same point as, the SO₂ sample. The SO₂ emission rate shall be computed for each pair of SO₂ and O₂ samples. The SO₂ emission rate for each run shall be the arithmetic mean of the results of the two pairs of samples.

[40 CFR 60.46(b)(4)(ii)]

2.8.5 Method 7 shall be used to determine the NO_x concentration.

[40 CFR 60.46(b)(5)]

 The sampling site and location shall be the same as for the SO₂ sample. Each run shall consist of four grab samples, with each sample taken at about 15-minute intervals.

[40 CFR 60.46(b)(5)(i)]

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 For each NO_x sample, the emission rate correction factor, grab sampling and analysis procedure of Method 3B shall be used to determine the O₂ concentration (%O₂). The sample shall be taken simultaneously with, and at the same point as, the NO_x sample.

[40 CFR 60.46(b)(5)(ii)]

• The NO_x emission rate shall be computed for each pair of NO_x and O₂ samples. The NO_x emission rate for each run shall be the arithmetic mean of the results of the four pairs of samples.

[40 CFR 60.46(b)(5)(iii)]

2.9 The owner or operator may use the list in 40 CFR 60.46(d) as alternatives to the reference methods and procedures in 40 CFR 60 or in other 40 CFR sections as specified.

[40 CFR 60.46(d)]

2.10 All requests, reports, applications, submittels, and other communications to the Administrator pursuant to 40 CFR 60 shall be submitted in duplicate to the Region 10 Office of the EPA, to the attention of the Director of the Office of Air Quality. All information required to be submitted to the EPA for applicable New Source Performance Standards requirements must also be submitted to the Department.

[40 CFR 60.4(a)]

2.11 Any owner or operator subject to the provisions of 40 CFR 60 shall furnish the Administrator written notification or, if acceptable to both the Administrator and the owner or operator of a source, electronic notification, as follows:

[40 CFR 60.7(a)]

A notification of the date construction (or reconstruction as defined under 40 CFR 60.15) of an affected
facility is commenced, postmarked no later than 30 days after such date. This requirement shall not apply
in the case of mass-produced facilities that are purchased in completed form.

[40 CFR 60.7(a)(1)]

 A notification of the actual date of initial startup of an affected facility, postmarked within 15 days after such date.

[40 CFR 60.7(a)(3)]

• A notification of any physical or operational change to an existing facility that may increase the emission rate of any air pollutant to which a standard applies, unless that change is specifically exempted under an applicable subpart of 40 CFR 60 or in 40 CFR 60.14(e). This notice shall be postmarked 60 days, or as soon as practicable, before the change is commenced, and shall include information describing the precise nature of the change, present and proposed emission control systems, productive capacity of the facility before and after the change, and the expected completion date of the change. The Administrator may request additional relevant information subsequent to this notice.

[40 CFR 60.7(a)(4)]

 A notification of the date upon which demonstration of the continuous monitoring system performance commences in accordance with 40 CFR 60.13(c). Notification shall be postmarked not less than 30 days prior to such date.

[40 CFR 60.7(a)(5)]

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 A notification of the anticipated date for conducting the opacity observations required by 40 CRF 60.11(e)(1). The notification shall also include, if appropriate, a request for the Administrator to provide a visible emissions reader during a performance test. The notification shall be postmarked not less than 30 days prior to such date.

[40 CFR 60.7(a)(6)]

A notification that continuous opacity monitoring system data results will be used to determine compliance
with the applicable opacity standard during a performance test required by 40 CFR 60.8 in lieu of Method
9 observation data as allowed by 40 CFR 60.11(e)(5). This notification shall be postmarked not less than
30 days prior to the date of the performance test.

[40 CFR 60.7(a)(6)]

2.12 Any owner or operator subject to the provisions of 40 CFR 60 shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative.

[40 CFR 60.7(b)]

2.13 Each owner or operator required to install a continuous monitoring device shall submit excess emissions and monitoring systems performance reports and/or summary report forms (see 40 CFR 60.7(d), or Appendix A of this permit) to the Administrator semiannually, except when more frequent reporting is specifically required by an applicable subpart, or the Administrator, on a case-by-case basis, determines that more frequent reporting is necessary to accurately assess the compliance status of the source. All reports shall be postmarked by the 30th day following the end of each six-month period. Written reports of excess emissions shall include the following information:

[40 CFR 60.7(c); Permit No. 13-1480-0001-02, 3/19/81]

 The magnitude of excess emissions computed in accordance with 40 CFR 60.13(h), any conversion factor(s) used, the date and time of commencement and completion of each time period of excess emissions, and the process operating time during the reporting period.

[40 CFR 60.7(c)(1)]

A specific identification of each period of excess emissions that occurs during startups, shutdowns, and
malfunctions of the affected facility; the nature and cause of any malfunction (if known); and the corrective
action taken or preventative measures adopted.

[40 CFR 60.7(c)(2)]

 The date and time identifying each period during which the continuous monitoring system was inoperative (except for zero and span checks) and the nature of the system repairs or adjustments.

[40 CFR 60.7(c)(3)]

• Information concerning times when no excess emissions occurred or the continuous monitoring system(s) were not inoperative, repaired, or adjusted.

[40 CFR 60.7(c)(4)]

2.14 The summary report form shall contain the information and be in the format shown in 40 CFR 60.7(d), Figure 1 and Appendix A of this permit unless otherwise specified by the Administrator. One summary report form shall be submitted for each pollutant monitored at each affected facility.

[40 CFR 60.7(d); Permit No. 13-1480-0001-02, 3/19/81]

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If the total duration of excess emissions for the reporting period is less than 1% of the total operating time
for the reporting period and continuous monitoring system (CMS) downtime for the reporting period is less
than 5% of the total operating time for the reporting period, only the summary report form shall be
submitted; the excess emission report described in 40 CFR 60.7(c) need not be submitted unless
requested by the Administrator.

[40 CFR 60.7(d)(1)]

• If the total duration of excess emissions for the reporting period is 1% or greater of the total operating time for the reporting period or the total CMS downtime for the reporting period is 5% or greater of the total operating time for the reporting period, the summary report form and the excess emission report described in 40 CFR 60.7(c) shall both be submitted.

[40 CFR 60.7(d)(2)]

Any owner or operator subject to the provisions of 40 CFR 60 shall maintain a file of all measurements, including continuous monitoring system, monitoring device, and performance testing measurements; all continuous monitoring system performance evaluations; all continuous monitoring system or monitoring device calibration checks; adjustments and maintenance performed on these systems or devices; and all other information required by 40 CFR 60 recorded in a permanent form suitable for inspection. The file shall be retained for at least five years following the date of such measurements, maintenance, reports, and records, except as follows:

[40 CFR 60.7(f)]

- This paragraph applies to owners or operators required to install a continuous emissions monitoring system (CEMS) where the CEMS installed is automated, and where the calculated data averages do not exclude periods of CEMS breakdown or malfunction. An automated CEMS records and reduces the measured data to the form of the pollutant emission standard through the use of a computerized data acquisition system. In lieu of maintaining a file of all CEMS subhourly measurements as required under 40 CFR 60.7(f) and Permit Condition 2.15, the owner or operator shall retain the most recent consecutive three averaging periods of subhourly measurements and a file that contains a hard copy of the data acquisition system algorithm used to reduce the measured data into the reportable form of the standard.

 [40 CFR 60.7(f)(1)]
- This paragraph applies to owners or operators required to install a CEMS where the measured data is manually reduced to obtain the reportable form of the standard, and where the calculated data averages do not exclude periods of CEMS breakdown or malfunction. In lieu of maintaining a file of all CEMS subhourly measurements as required under 40 CFR 60.7(f) and Permit Condition 2.15, the owner or operator shall retain all subhourly measurements for the most recent reporting period. The subhourly measurements shall be retained for 120 days from the date of the most recent summary or excess emission report submitted to the Administrator.

[40 CFR 60.7(f)(2)]

The Administrator or delegated authority, upon notification to the source, may require the owner or
operator to maintain all measurements as required by 40 CFR 60.7(f) and Permit Condition 2.15, if the
Administrator or the delegated authority determines these records are required to more accurately assess
the compliance status of the affected source.

[40 CFR 60.7(f)(3)]

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The Amalgamated Sugar Company, LLC

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2.16 Within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup of such facility, and at such other times as may be required by the Administrator under section 114 of the Clean Air Act, the owner or operator of such facility shall conduct performance test(s) and furnish the Administrator a written report of the results of such performance test(s).

[40 CFR 60.8(a)]

2.17 Performance tests shall be conducted and data reduced in accordance with the test methods and procedures contained in each applicable subpart unless the Administrator (1) specifies or approves, in specific cases, the use of a reference method with minor changes in methodology; (2) approves the use of an equivalent method, (3) approves the use of an alternative method, the results of which he has determined to be adequate for indicating whether a specific source is in compliance; (4) waives the requirement for performance tests because the owner or operator of a source has demonstrated by other means to the Administrator's or satisfaction that the affected facility is in compliance with the standard; or (5) approves shorter sampling times and smaller sample volumes when necessitated by process variables or other factors. Nothing in this paragraph shall be construed to abrogate the Administrator's authority to require testing under Section 114 of the Clean Air Act.

[40 CFR 60.8(b)]

2.18 Performance tests shall be conducted under such conditions as the Administrator shall specify to the plant operator based on representative performance of the affected facility. The owner or operator shall make available to the Administrator such records as may be necessary to determine the conditions of the performance tests.

Operations during periods of startup, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test nor shall emissions in excess of the level of the applicable emission limit during periods of startup, shutdown, and malfunction be considered a violation of the applicable emission limit unless otherwise specified in the applicable standard.

[40 CFR 60.8(c)]

2.19 The owner or operator of an affected facility shall provide the Administrator at least 30 days prior notice of any performance test, except as specified under other subparts, to afford the Administrator the opportunity to have an observer present. If after 30 days notice for an initially scheduled performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify the Administrator (or delegated State or local agency) as soon as possible of any delay in the original test date, either by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled date with the Administrator (or delegated State or local agency) by mutual agreement.

[40 CFR 60.8(d)]

- 2.20 The owner or operator of an affected facility shall provide, or cause to be provided, performance testing facilities as follows:
 - Sampling ports adequate for test methods applicable to such facility, including (a) constructing the air
 pollution control system such that volumetric flow rates and pollutant emission rates can be accurately
 determined by applicable test methods and procedures and (b) providing a stack or duct free of cyclonic
 flow during performance tests, as demonstrated by applicable test methods and procedures.

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- Safe sampling platform(s).
- · Safe access to sampling platform(s).
- · Utilities for sampling and testing equipment.

[40 CFR 60.8(e)]

2.21 Unless otherwise specified in the applicable subpart of 40 CFR 60, each performance test shall consist of three separate runs using the applicable test method. Each run shall be conducted for the time and under the conditions specified in the applicable standard. For the purpose of determining compliance with an applicable standard, the arithmetic means of results of the three runs shall apply. In the event that a sample is accidentally lost or conditions occur in which one of the three runs must be discontinued because of forced shutdown, failure of an irreplaceable portion of the sample train, extreme meteorological conditions, or other circumstances beyond the owner or operator's control, compliance may, upon the Administrator's approval, be determined using the arithmetic mean of the results of the two other runs.

[40 CFR 60.8(f)]

- 2.22 Compliance with standards in 40 CFR 60, other than opacity standards, shall be determined in accordance with performance tests established by 40 CFR 60.8, unless otherwise specified in the applicable standard.

 [40 CFR 60.11(a)]
- 2,23 Compliance with opacity standards in 40 CFR 60 shall be determined by conducting observations in accordance with Reference Method 9 in Appendix A of 40 CFR 60, any alternative method that is approved by the Administrator, or as provided in 40 CFR 60,11(e)(5).

For purposes of determining initial compliance, the minimum total time of observations shall be three hours (30 six-minute averages) for the performance test or other set of observations (meaning those fugitive-type emission sources subject only to an opacity standard).

[40 CFR 60,11(b)]

2.24 The opacity standards set forth in 40 CFR 60 shall apply at all times except during periods of startup, shutdown, malfunction, and as otherwise provided in the applicable standard.

[40 CFR 60.11(c)]

2.25 At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Administrator. This information may include, but is not limited to, monitoring results, opacity observations, operating and maintenance procedures, and source inspections.

[40 CFR 60.11(d); Permit No. 13-1480-0001-02, 3/19/81]

- 2.26 For the purpose of demonstrating initial compliance, opacity observations shall be conducted concurrently with the initial performance test required in 40 CFR 60.8 unless one of the following conditions applies:
 - If visibility or other conditions prevent the opacity observations from being conducted concurrently with the
 initial performance test required under 40 CFR 60.8, the source owner or operator shall reschedule the
 opacity observations as soon after the initial performance test as possible, but not later than 30 days
 thereafter, and shall advise the Administrator of the rescheduled date. In these cases, the 30-day prior

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notification to the Administrator required in 40 CFR 60.7(a)(6) shall be waived. The rescheduled opacity observations shall be conducted (to the extent possible) under the same operating conditions that existed during the initial performance test conducted under 40 CFR 60.8. The visible emissions observer shall determine whether visibility or other conditions prevent the opacity observations from being made concurrently with the initial performance test in accordance with procedures contained in Reference Method 9 of Appendix B of 40 CFR 60. Opacity readings of portions of plumes which contain condensed, uncombined water vapor shall not be used for purposes of determining compliance with opacity standards. The owner or operator of an affected facility shall make available, upon request by the Administrator, such records as may be necessary to determine the conditions under which the visual observations were made and shall provide evidence indicating proof of current visible observer emission certification.

Except as provided in of 40 CFR 60.11(e)(5), the results of continuous monitoring by a transmissometer
which indicate that the opacity at the time visual observations were made was not in excess of the
standard are probative but not conclusive evidence of the actual opacity of an emission, provided that the
source shall meet the burden of proving that the instrument used meets (at the time of the alleged
violation) Performance Specification 1 in Appendix B of 40 CFR 60, has been properly maintained, and
that the resulting data have not been altered in any way.

[40 CFR 60.11(e)(1)]

2.27 Except as provided in 40 CFR 60.11(e)(3), the owner or operator of an affected facility to which an opacity standard in 40 CFR 60 applies, shall conduct opacity observations in accordance with paragraph (b) of 40 CFR 60.11, shall record the opacity of emissions, and shall report to the Administrator the opacity results along with the results of the initial performance test required under 40 CFR 60.8. The inability of an owner or operator to secure a visible emissions observer shall not be considered a reason for not conducting the opacity observations concurrent with the initial performance test.

[40 CFR 60.11(e)(2)]

2.28 The owner or operator of an affected facility to which an opacity standard in 40 CFR 60 applies may request that the Administrator determine and record the opacity of emissions from the affected facility during the initial performance test and at such times as may be required. The owner or operator of the affected facility shall report the opacity results. Any request to the Administrator to determine and to record the opacity of emissions from an affected facility shall be included in the notification required in 40 CFR 60.7(a)(6). If, for some reason, the Administrator cannot determine and record the opacity of emissions from the affected facility during the performance test, then the provisions of 40 CFR 60.11(e)(1) shall apply.

[40 CFR 60.11(e)(3)]

2.29 An owner or operator of an affected facility using a continuous opacity monitor (transmissometer) shall record the monitoring data produced during the initial performance test required by 40 CFR 60.8 and shall furnish the Administrator a written report of the monitoring results along with Method 9 and 40 CFR 60.8 performance test results.

[40 CFR 60.11(e)(4)]

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

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Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

2.30 An owner or operator of an affected facility subject to an opacity standard may submit, for compliance purposes, continuous opacity monitoring system (COMS) data results produced during any performance test required under 40 CFR 60.8 in lieu of Method 9 observation data. If an owner or operator elects to submit COMS data for compliance with the opacity standard, he shall notify the Administrator of that decision, in writing, at least 30 days before any performance test required under 40 CFR 60.8 is conducted. Once the owner or operator of an affected facility has notified the Administrator to that effect, the COMS data results will be used to determine opacity compliance during subsequent tests required under 40 CFR 60.8 until the owner or operator notifies the Administrator, in writing, to the contrary. For the purpose of determining compliance with the opacity standard during a performance test required under 40 CFR 60.8 using COMS data, the minimum total time of COMS data collection shall be averages of all six-minute continuous periods within the duration of the mass emission performance test. Results of the COMS opacity determinations shall be submitted along with the results of the performance test required under 40 CFR 60.8. The owner or operator of an affected facility using a COMS for compliance purposes is responsible for demonstrating that the GOMS meets the requirements specified in 40 CFR 60.13(c), that the COMS has been properly maintained and operated, and that the resulting data have not been altered in any way, If COMS data results are submitted for compliance with the opacity standard for a period of time during which Method 9 data indicates noncompliance, the Method 9 data will be used to determine opacity compliance.

[40 CFR 60.11(e)(5)]

2.31 For the purpose of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in 40 CFR 60, nothing in 40 CFR 60 shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed.

[40 CFR 60.11(g)]

2.32 No owner or operator subject to the provisions of 40 CFR 60 shall build, erect, install, or use any article, machine, equipment, or process, the use of which conceals an emission that would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous dilutants to achieve compliance with an opacity standard or with a standard that is based on the concentration of a pollutant in the gases discharged to the atmosphere.

[40 CFR 60.12]

2.33 For the purposes of 40 CFR 60.13, all continuous monitoring systems required under applicable subparts of 40 CFR 60.13 shall be subject to the provisions of 40 CFR 60.13 upon promulgation of performance specifications for continuous monitoring systems under Appendix B of 40 CFR 60 and, if the continuous monitoring system is used to demonstrate compliance with emission limits on a continuous basis, Appendix F of 40 CFR 60, unless otherwise specified in an applicable subpart or by the Administrator.

[40 CFR 60.13(a)]

2.34 All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests under 40 CFR 60.8. Verification of operational status shall, at a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device.

[40 CFR 60.13(b)]

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2.35 If the owner or operator of an affected facility elects to submit COMS data for compliance with the opacity standard as provided under 40 CFR 60.11(e)(5), he shall conduct a performance evaluation of the COMS as specified in Performance Specification 1, Appendix B, of 40 CFR 60 before the performance test required under 40 CFR 60.8 is conducted. Otherwise, the owner or operator of an affected facility shall conduct a performance evaluation of the COMS or CEMS during any performance test required under 40 CFR 60.8 or within 30 days thereafter in accordance with the applicable performance specification in Appendix B of 40 CFR 60. The owner or operator of an affected facility shall conduct COMS or CEMS performance evaluations at such other times as may be required by the Administrator under Section 114 of the Clean Air Act.

[40 CFR 60.13(c)]

The owner or operator of an affected facility using a COMS to determine opacity compliance during any
performance test required under 40 CFR 60.8 and as described in 40 CFR 60.11(e)(5) shall furnish the
Administrator two or, upon request, more copies of a written report of the results of the COMS
performance evaluation described in 40 CFR 60.13(c) at least 10 days before the performance test
required under 40 CFR 60.8 is conducted.

[40 CFR 60.13(c)(1)]

 Except as provided in 40 CFR 60.13(c)(1), the owner or operator of an affected facility shall furnish the Administrator within 60 days of completion two or, upon request, more copies of a written report of the results of the performance evaluation.

[40 CFR 60.13(c)(2)]

Owners and operators of all CEMS installed in accordance with the provisions of 40 CFR 60 shall check the zero (or low-level value between 0 and 20% of span value) and span (50 to 100% of span value) calibration drifts at least once daily in accordance with a written procedure. The zero and span shall, at a minimum, be adjusted whenever the 24-hour zero drift or 24-hour span drift exceeds two times the limits of the applicable performance specifications in Appendix B of 40 CFR 60. The system must allow the amount of excess zero and span drift measured at the 24-hour interval checks to be recorded and quantified, whenever specified. For continuous monitoring systems measuring opacity of emissions, the optical surfaces exposed to the effluent gases shall be cleaned prior to performing the zero and span drift adjustments except for systems using automatic zero adjustments. The optical surfaces shall be cleaned when the cumulative automatic zero compensation exceeds 4% opacity.

[40 CFR 60.13(d)(1)]

Unless otherwise approved by the Administrator, minimum procedures shall be followed for continuous monitoring systems measuring opacity of emissions. Minimum procedures shall include a method for producing a simulated zero-opacity condition and an upscale (span) opacity condition using a certified neutral-density filter or other related technique to produce a known obscuration of the light beam. Such procedures shall provide a system check of the analyzer internal optical surfaces and all electronic circuitry including the lamp and photodetector assembly.

[40 CFR 60.13(d)(2)]

2.37 Except for system breakdowns, repairs, calibration checks, and zero and span adjustments required under 40 CFR 60.13(d), all continuous monitoring systems shall be in continuous operation and shall meet minimum frequency of operation requirements as follows:

[40 CFR 60.13(e)]

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Twin Falls, Idaho

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring opacity of emissions
shall complete a minimum of one cycle of sampling and analyzing for each successive ten-second period
and one cycle of data recording for each successive six-minute period.

[40 CFR 60.13(e)(1)]

All continuous monitoring systems referenced by 40 CFR 60.13(c) for measuring emissions, except
opacity, shall complete a minimum of one cycle of operation (sampling, analyzing, and data recording) for
each successive 15-minute period.

[40 CFR 60.13(e)(2)]

2.38 All continuous monitoring systems or monitoring devices shall be installed such that representative measurements of emissions or process parameters from the affected facility are obtained. Additional procedures for locating continuous monitoring systems contained in the applicable Performance Specifications of Appendix B of 40 CFR 60 shall be used.

[40 CFR 60.13(f)]

Owners or operators of all continuous monitoring systems for measurement of opacity shall reduce all data to six-minute averages, and for continuous monitoring systems other than opacity to one-hour averages for time periods as defined in 40 CFR 60.2. Six-minute opacity averages shall be calculated from 36 or more data points equally spaced over each six-minute period. For continuous monitoring systems other than opacity, one-hour averages shall be computed from four or more data points equally spaced over each one-hour period. Data recorded during periods of continuous system breakdown, repair, calibration checks, and zero and span adjustments shall not be included in the data averages computed under this paragraph. For owners and operators complying with the requirements in 40 CFR 60.7(f)(1) or (2), data averages must include any data recorded during periods of monitor breakdown or malfunction. An arithmetic or integrated average of all data may be used. The data may be recorded in reduced or nonreduced form (e.g., ppm, pollutant and percent O₂, or ng/J of pollutant). All excess emissions shall be converted into units of the standard using the applicable conversion procedures specified in subparts of 40 CFR 60. After conversion into units of the standard, the data may be rounded to the same number of significant digits as used in the applicable subparts to specify the emission limit (e.g., rounded to the nearest 1% opacity).

[40 CFR 60.13(h)]

Permit Limits/Operating Requirements

2.40 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of 0.100 gr/dscf corrected to 8% of O₂ concentration.

[IDAPA 58.01.01.677, 5/1/94; Permit No. 13-1480-0001-01, 3/19/81]

2.41 The permittee shall comply with Permit Condition 1.7.

[IDAPA 58.01.01.625, 4/5/00; Permit No. 13-1480-0001-01, 3/19/81]

2.42 The Foster Wheeler coal-fired boiler shall be fueled exclusively by coal.

[IDAPA 58.01.01.322.01, 3/19/99]

Permittee:

Location:

The Amalgamated Sugar Company, LLC

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Twin Falls, Idaho Date Expires: December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

The pressure drop across the baghouse shall be kept within the range from 1.0 to 10 inches of water column. 2.43

Deviations from the allowable operating range of the pressure drop across the baghouse may not by themselves be considered deviations from applicable emissions standards (i.e., Permit Conditions 2.1 and 2.41), unless the Department determines that the frequency, duration, or magnitude of the deviations indicate additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with the General Provisions 13.24 and 13.25, and Permit Condition 1.9, if applicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

Monitoring and Recordkeeping

2.44 The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the pressure drop across the baghouse. The pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

Permittee:

The Amalgamated Sugar Company, LLC

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

3. EMISSIONS UNIT GROUP 2: B&W BOILER (S-B2)

Summary Description

The following paragraph and Table 3.1 are narrative descriptions of the B&W boiler regulated in this Tier I permit. These descriptions are for informational purposes only.

The B&W boiler has a maximum operational capacity of 250,000 pounds of steam per hour. The B&W boiler can be fired on natural gas, coal, or a combination of the two fuels, and is used to provide steam for process(es) and electricity generation.

Table 3.1 describes the devices used to control emissions from the B&W Boiler.

Table 3.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Point Identification	Emissions Unit(s)/Process(es)	Emission Control Device	
P-82	B&W boiler (S-B2)	Baghouse (A - B2)	

Table 3.2 contains a summary of requirements that apply generally to the B&W Boiler. Specific permit requirements are listed below Table 3.2.

Table 3.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
	PM (coal only)	0.100 gr/dscf at 8% O ₂	IDAPA 58.01.01.677 & 678; Permit No. 13-1480-0001-00	3.6, 3.8, 3.10, 1.11
3.1	PM (combination of coal and natural gas)	0.100* X + 0.011 *Y at 8% O ₂	IDAPA 58.01.01.677 & 678; Permit No. 13-1480-0001-00	3.2, 3.6, 3.8, 3.10, 1.11
	PM (natural gas only)	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.677	None required
1.7	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625; Permit No. 13-1480-0001-00	3.7, 1.11
3.4	Baghouse pressure drop	1.0-10.0 inches of water	IDAPA 58.01.01.322.0607	3.8, 1.11

Permittee:

The Amalgamated Sugar Company, LLC

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December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Permit Limits/Operating Requirements

3.1 A person shall not discharge to the atmosphere from any fuel-burning equipment in operation prior to October 1, 1979, or with a maximum rated input of less than 10 MMBtu/hr, PM in excess of the concentrations shown in Table 3.3. The effluent gas volume shall be corrected to the oxygen concentration shown.

Table 3.3 FUEL-BURNING EQUIPMENT GRAIN-LOADING STANDARDS

Fuel Type	Allowable Particulate Emissions	Percent Oxygen
Coal, or the combination of coal and natural gas	0.100*X + 0.011*Y ¹	8%
Gas only	0.015 gr/dscf	3%

¹X is the percentage of total heating input derived from the combustion of coal;

When two or more types of fuel are burned concurrently, the allowable emission shall be determined by proportioning the gross heat input and emission standards for each fuel.

[IDAPA 58.01.01.677, 678, 5/1/94; Permit No. 13-1480-0001-00, 3/19/81]

3.2 The permittee shall monitor and record the boiler fuel type whenever the fuel type is changed. The records shall be maintained in accordance with Permit Condition 1.11. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

3.3 The B&W Boiler shall be fueled on coal, natural gas, or any combination of coal and natural gas. Permit Condition 3.7 does not apply when combusting natural gas exclusively.

[IDAPA 58.01.01.322.01, 3/19/99]

- 3.4 The pressure drop across the baghouse shall be kept within the range from 1.0 to 10.0 inches of water column.
 - Deviations from the allowable operating range of pressure drop across the baghouse may not by themselves be considered deviations from applicable emissions standard unless the Department determines that the frequency, duration, or magnitude of the deviations indicates additional action is required. All deviations shall be reported in accordance with Permit Condition 1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

3.5 The permittee shall, at all times, maintain and operate the baghouse in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Y is the percentage of total heating input derived from the combustion of natural gas

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Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Compliance Testing

3.6 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 3.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:

- The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157.
 Test methods and procedures shall comply with IDAPA 58.01.01.157.
- Prior to conducting the test, the permittee shall address the required averaging period in accordance with IDAPA 58.01.01.679 and the altitude correction in IDAPA 58.01.01.680.
- A visible emissions evaluation shall be performed during each compliance test. The visible emissions evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
- The permittee shall monitor and record the heat input rate of the boiler, coal feed rate in tons per hour, and the pressure drop across the baghouse during each test.
- For the coal used during the source test, the permittee shall record the coal's high heating value and coal's analysis results, including ash content.
- If the PM measured in the initial compliance test is less than or equal to 75% of the emission standard in Permit Condition 3.1, no further testing shall be required during the term of this permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90% of the emission standard in Permit Condition 3.1, a second test shall be required in the third year of this permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 3.1, the permittee shall conduct a compliance test annually.
- The permittee shall record and maintain information required under Permit Condition 3.7 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 09, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00; Permit No. 13-1480-0001-02; Permit No. 13-1480-0001-01, Section 1.1, p. 3 of 7, 3/19/81]

Monitoring and Recordkeeping

3.7 The permittee shall conduct weekly visible emissions observations during daylight hours and under normal operating conditions while combusting coal or a combination of coal and natural gas. If any level of visible emissions is present, a certified visible emissions reader shall perform a visible emissions reading in accordance with the procedures contained in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded. If visible emissions are not present, the permittee shall observe the emissions point for at least six minutes to document that there are no visible emissions. The results of each weekly evaluation shall be recorded, including, but not limited to, the date of observation, time of observation, equipment/emission point observed, and presence of any visible emissions, and opacity reading if visible emissions were present. The record shall be maintained in accordance with Permit Condition 1.11.

If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

During a month that a compliance test required by Permit Condition 3.7 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

The permittee shall install, operate, calibrate, and maintain a monitoring device to continuously measure the 3.8 pressure drop across the baghouse. The pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device becomes inoperable, it shall be repaired or replaced as soon as practicable.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07. 5/1/94]

At least once each year during a planned maintenance outage, or as needed during operation, the baghouse 3.9 shall be inspected for physical degradation that could affect the performance of the baghouse. The permittee shall make all necessary repairs to the baghouse to ensure efficient operation.

[IDAPA 58.01.01.322.01, 3/19/99]

Operations and Maintenance Manual

- 3,10 The permittee shall develop an initial O&M manual based on the results and operating parameters of the firstyear compliance test that demonstrates compliance with this permit. This initial O&M manual shall be submitted to the Department for review and approval no later than six months after completion of the firstyear compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.
 - After approval of the initial O&M manual, the permittee shall update the control device monitoring program in the O&M manual after each compliance test, Each updated O&M manual and corresponding compliance test report shall be submitted to the Department for review and approval. The permittee may update the O&M manual at any time during the permit term. The updated control device monitoring program in the O&M manual shall not become effective until approved by the Department. If the Department deems that the change in the O&M manual qualifies as significant permit modification as defined in IDAPA 58.01.01.382, the procedures specified in IDAPA 58.01.01.382 shall be followed to make the change.
 - The O&M manual shall address the operation, maintenance, and repair of the B&W boiler's baghouse to ensure that it is in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
 - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The monitoring parameters shall include, but are not limited to, parameters required in Permit Condition 3.8, unless the Department approves their removal from this permit condition. The control device monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

• The O&M manual shall be maintained onsite and made available to Department representatives upon request.

• Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with the Permit Condition 1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; Permit No. 13-1480-0001, General Provision H, 01/01/84]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

4. EMISISONS UNIT GROUP 3: KEELER NATURAL GAS-FIRED BOILER (S-B3)

Summary Description

The following paragraph is a narrative description of the Keeler natural gas-fired boiler regulated in this Tier I permit. This description is for informational purposes only.

The Keeler natural gas-fired boiler is rated at 80,000 pounds of steam per hour, per the permit application. The steam generated by this boiler is used for the process. Emissions are uncontrolled.

Table 4.1 contains a summary of the requirements that apply to the natural gas-fired boiler. Specific permit requirements are listed below Table 4.1.

Table 4.1 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.7	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625	1.8, 4.2, 1.11
4.1	РМ	0.015 gr/dscf at 3% O ₂	IDAPA 58.01.01.676, 677	4.2, 1.11
4.2	Fuel	Natural gas only	IDAPA 58.01.01.322.01	1.11

Permit Limits/Operating Requirements

4.1 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% O₂ by volume for gas.

[IDAPA 58.01.01.676, 677, 5/1/94]

4.2 The permittee shall only use natural gas as fuel in the natural gas-fired boiler.

[IDAPA 58.01.01.322.01, 3/19/99]

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5. EMISSIONS UNIT GROUP 4: PULP DRYER (S-D1)

Summary Description

The following paragraph and Table 5.1 are a narrative description of the pulp dryer regulated in this Tier I permit. This description is for informational purposes only.

The direct-fired pulp dryer is used to dry pressed beet pulp. The dryer is primarily coal-fired. Exhaust gasses from the dryer are split into two streams. Each stream passes through a cyclone and a spray-impingement-type scrubber in series. According to TASCO's February 3, 1999 submittal, the dryer has a design capacity of 74.5 tons per hour process weight input rate. The process weight input rate has the same meaning as defined in IDAPA 58.01.01.006.80.

Table 5.1 describes the devices used to control emissions from the pulp dryer.

Table 5.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Point Identification	Emissions Unit/Process	Emission Control Device		
P-D1A	74.5 ton-per-hour process weight	One cyclone and one spray- impingement-type scrubber in series		
P-D1B	input rate pulp dryer (S-D1)	One cyclone and one spray- impingement-type scrubber in series		

Table 5.2 contains a summary of requirements that apply generally to the pulp dryer. Specific permit requirements are listed below Table 5.2.

Table 5.2 APPLICABLE REQUIREMENTS SUMMARY FOR PULP DRYER

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Requiremen t Reference	Monitoring and Recordkeeping Requirements
1.7	Each scrubber	Visible emissions	20% opacity for no more than three minutes in any 60- minute period	IDAPA 58.01.01.625; Permit No. 1480-0001, p.2 of 6, limit 1,2	5.6, 1.11
5.1	Pulp dryer	PM	Process weight	IDAPA 58.01.01.703	5.2, 5.4, 5.7, 5.8, 5.9, 5.10, 5.12, 1.11

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The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Table 5.3 contains a summary of requirements that apply to each dryer's scrubber. Specific permit requirements are listed below Table 5.3.

Table 5.3 APPLICABLE REQUIREMENTS SUMMARY FOR SCRUBBERS

Control Device	Operating Parameter	Operating Range	Monitoring and Recording
	Pressure drop	3.0 to 6.6 inches of water column	
	Water flow	100 to 500 gallons per minute	
Each scrubber	Water pressure of sprays	Required to be developed within 12 months of permit issuance	5.2, 5.8-5.10, 5.12, 1.11
	Total concentration of total dissolved solids ar suspended particulate in the scrubber's recirculated water	f total dissolved solids and Required to be developed within	

Permit Limits/Operating Requirements

- 5.1 No person with equipment used exclusively to dehydrate sugar beet pulp shall emit PM to the atmosphere from any process or process equipment in excess of the amount shown in the following equations, where E is the total rate of emission from all emission points from the source in pounds per hour and PW is the process weight rate in pounds per hour:
 - a. If PW is less than 60,000 lb/hr,

$$E = 0.02518(PW)^{0.67}$$

b. If PW is greater than or equal to 60,000 lb/hr,

$$E = 23.84(PW)^{0.11} - 40$$
 [IDAPA 58.01.01.703, 4/5/00; Permit No. 1480-0001, p. 2 of 6, Limit 1.1, 01/01/84]

Until the permittee has an O&M manual that is developed in accordance with Permit Condition 5.12, the permittee shall operate within the operating range for each control device operating parameter specified below. When the O&M manual becomes effective, the permittee shall operate each control device within the operating range specified in the approval O&M manual. Whenever the water flow of each scrubber, or the pressure drop across each scrubber is below or exceeds the range allowed in Permit Condition 5.2, the permittee shall take corrective action as expeditiously as practicable to bring it back to the allowable range. If no action can be taken practically, an explanation shall be provided in a report, as required by Permit Condition 1.9. Deviations from this allowable operating range shall not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates additional action is required. Failure to take corrective action may be considered a violation of this permit condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9.

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

• The water flow of each scrubber shall be maintained within the range from 100 to 500 gallons per minute

 The pressure drop across each scrubber shall be maintained within the range from 3 to 6.6 inches of water column

[IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

5.3 The permittee shall, at all times, maintain and operate each cyclone and each scrubber in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Compliance Testing

- 5.4 A compliance test shall be conducted within the first 12 months of this permit term to demonstrate compliance with Permit Condition 5.1. Testing shall be conducted in accordance with IDAPA 58.01.01.157, Permit Condition 1.20, and the following:
 - The permittee shall conduct a PM compliance test using the test outlined in 40 CFR 60, Appendix A, Method 5, or such comparable and equivalent method approved in accordance with IDAPA 58.01.01.157.
 Test methods and procedures shall comply with IDAPA 58.01.01.157.
 - A visible emissions evaluation shall be performed during each compliance test. The visible emissions
 evaluation shall be conducted in accordance with the procedures contained in IDAPA 58.01.01.625.
 - For the pulp dryer, the process weight input (tons per hour) shall be calculated using the methodology described in Appendix B of this permit, Pulp Dryer Material Input Rate Calculation, or as otherwise approved in writing by the Department. Parameters and operating data used to calculate the process weight input must also be recorded for each compliance test run. These parameters and operating data include total dried pulp produced (tons per day), dried pulp moisture content (percent by weight), pressed pulp moisture content (percent by weight), fuel heating value (Btu/lb), fuel input per ton of dried pulp (therms per ton), quantity of additives (percent of dry substance per ton of dry pulp), solids content of the additives, and throughput to each dryer (percent).
 - The permittee shall collect a representative sample of recirculated water from the scrubber during each
 compliance test. The total concentration of total dissolved solids and suspended solids of the recirculated
 water sample shall be analyzed and recorded and expressed in microgram solids per liter of water.
 - For each scrubber, the permittee shall record the pressure drop across the scrubber, water flow of the scrubber, and water pressure of sprays.
 - If the PM measured during in the initial compliance test is less than or equal to 75% of the emission standards in Permit Condition 5.1, no further testing shall be required during this term of this permit. If the PM measured during the initial compliance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 5.1, a second test shall be required in the third year of the permit term. If the PM measured during the initial compliance test is greater than 90% of the emission standard in Permit Condition 5.1, the permittee shall conduct a compliance test annually.

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Twin Falls, Idaho

Date Expires:

December 17, 2005

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The permittee shall record and maintain information required under Permit Condition 5.4 in accordance with Permit Condition 1.11.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

The permittee may conduct additional compliance tests during the permit term to revise the operating 5.5 parameters in Permit Condition 5.2, and/or parameters developed under Permit Condition 5.4, so long as the compliance tests conform to all requirements of this permit.

[IDAPA 58.01.01.322.01, 3/19/99]

Monitoring and Recordkeeping

The permittee shall conduct weekly visible emissions observations during daylight hours and under normal 5.6 operating conditions. If any level of visible emissions is present, a certified visible emissions reader shall perform a visible emissions observation in accordance with the procedures contained in IDAPA 58.01.01.625. A minimum of 30 such observations shall be recorded. If visible emissions are not present, the permittee shall observe the emissions point for at least six minutes to document that there are no visible emissions. The results of each weekly evaluation shall be recorded, including, but not limited to, the date of observation, time of observation, equipment/emission point observed, and presence of any visible emissions, and opacity reading if there were visible emissions. The record shall be maintained in accordance with Permit Condition 1.11.

If opacit, is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period the permittee shall take all necessary corrective actions and report the exceedance in its annual compliance certification and in accordance with IDAPA 58.01.01.130-136.

During a month that a compliance test required by Section 5.4 is scheduled, the weekly visible emissions evaluation shall be performed during the compliance test. Results of the visible emissions evaluation shall be submitted with the compliance test report.

[IDAPA 58.01.01.322.06, 07, 5/1/94; IDAPA 58.01.01.322.08, 4/5/00]

5.7 The permittee shall record the process weight input rate for each dryer monthly. It shall be calculated in accordance with the Pulp Dryer Throughput Calculation Spreadsheet in Appendix B of this permit, or as otherwise approved in writing by the Department.

[IDAPA 58.01.01.322.06, 07, 5/1/94, IDAPA 58.01.01.322.08, 4/5/00; Permit No. 1480-0001, 01/01/84]

- The permittee shall install, operate, calibrate, and maintain monitoring devices to continuously measure the 5.8 scrubber water flow rate and pressure drop across the scrubber. The flow rate and pressure drop shall be recorded weekly and the records maintained in accordance with Permit Condition 1.11. In the event the monitoring device(s) becomes inoperable, it/they shall be repaired or replaced as soon as practicable. [IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]
- The permittee shall collect a representative sample of recirculated water from the scrubber monthly from 5.9 September to December, and biweekly from January to the end of each campaign. The concentration of suspended particulate and total dissolved solids in the recirculated water sample shall be analyzed and recorded. The result shall be expressed in microgram solids per liter of water.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94]

Permittee: The Amalgam

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location: Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

5.10 All the records shall be recorded and maintained in accordance with Permit Condition 1.11. The permittee shall record the starting and ending dates of each campaign.

[IDAPA 58.01.01.322.06, 07, 5/1/94]

5.11 At least once each year during a planned maintenance outage, or as needed during operation, each cyclone and scrubber shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to cyclone(s) and scrubber(s) to ensure efficient operation.

[IDAPA 58.01.01.322.01, 03/19/99]

Operations and Maintenance Manual

- 5.12 The permittee shall develop an initial O&M manual based on the results and operating parameters of the first-year compliance test that demonstrates compliance with this permit. This initial O&M manual shall be submitted to the Department for review and approval no later than six months after completion of the first-year compliance test that demonstrates compliance with this permit. The O&M manual is part of the terms and conditions of the permit.
 - After approval of the initial O&M manual, the permittee shall update the control device monitoring program in the O&M manual after each subsequent compliance test. Each updated O&M manual and corresponding compliance test report shall be submitted to the Department for review and approval. The permittee may update the O&M manual at any time during the permit term. The updated control device monitoring program in the O&M manual shall not become effective until approved by the Department, If the Department deems that the change in the O&M manual qualifies as significant permit modification as defined in IDAPA 58.01.01.382, the procedures specified in IDAPA 58.01.01.382 shall be followed to make the change.
 - The O&M manual shall address the operation, maintenance, and repair of the dryer's cyclone and wet scrubber to ensure that they are in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control devices; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing maifunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
 - The O&M manual shall include a control device monitoring program that establishes control device
 operating parameters to be monitored, their acceptable operating ranges, corrective action levels,
 monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The
 monitoring parameters shall include, but are not limited to, parameters required in Permit Conditions 5.8
 and 5.9, unless the Department approves their removal from this permit condition. The control devicemonitoring program shall be developed by the permittee based on compliance test results, vendor data,
 and other supporting documentation.
 - The O&M manual shall be maintained onsite and made available to Department representatives upon request.

Permittee: The Amalgamated Sugar Company, LLC

December 17, 2002

Location:

Twin Falls, Idaho

Date Issued: Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

Whenever an operating parameter is outside the operating range specified by the control device
monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as
practicable to bring the operating parameter back within the operating range. Deviations from the
operating range may not by themselves be considered deviations from applicable emissions standards
unless the Department determines that the frequency, duration, or magnitude of the deviations indicates
that additional action is required. Failure to take corrective action may be considered a violation of this
Permit Condition, if appropriate. All deviations shall be reported in accordance with the Permit Condition
1.9.

[IDAPA 58.01.01.322.01, 3/19/99; IDAPA 58.01.01.322.06, 07, 5/1/94; Permit No. 13-1480-0001, General Provision H, 01/01/84]

Permittee:

The Amalgamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6. EMISSIONS UNIT GROUP 5: PELLET COOLING (S-D2 & S-D3)

Summary Description

The following paragraph and Table 6.1 are a narrative description of the two pellet coolers regulated in this Tier I permit. These descriptions are for informational purposes only.

Emissions from the pellet coolers consist of PM and PM₁₀. Emissions from the two pellet coolers are controlled by one cyclone.

Table 6.1 describes the devices used to control emissions from the pellet coolers.

Table 6.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES

Emissions Point Identification	Emissions Unit(s)/Process(es)	Emission Control Device	
P-D2/3	8.3 tons-per-hour Pellet cooler No. 1 (S-D2)	One cyclone A - D2/3	
1 -52)0	8.3 tons-per-hour Pellet cooler No. 2 (S-D3)	One of ordinary and	

Table 6.2 contains a summary of requirements that apply generally to pellet coolers. Specific permit requirements are listed below Table 6.2.

Table 6.2 APPLICABLE REQUIREMENTS SUMMARY

Permit Conditions	Affected Emission Unit	Parameter	Permit Limit/ Standard Summary	Applicable Requirement Reference	Monitoring and Recordkeeping Requirements
1.7	Each emission point	Visible emissions	20% opacity for no more than three minutes in any 60-minute period	IDAPA 58.01.01.625	1.8, 6.2, 6.3, 1.11
6.1	Pellet cooler Nos.1 and 2 combined	РМ	Process weight	IDAPA 58.01.01.702	6.2, 6.3, 1.11

Permit Limits/Operating Requirements

- No person shall emit to the atmosphere from any process or process equipment operating prior to October 1, 1979, PM in excess of the amount shown by the following equations, where E is the allowable emission from the entire source in pounds per hour, and PW is the process weight in pounds per hour:
 - a. If PW is less than 17,000 lb/hr,

$$E = 0.045(PW)^{0.60}$$

b. If PW is equal to or greater than 17,000 lb/hr.

$$E = 1.12(PW)^{0.27}$$

[IDAPA 58.01.01.702, 4/5/00]

Permittee:

The Amaigamated Sugar Company, LLC

Date Issued:

December 17, 2002

Location:

Twin Falls, Idaho

Date Expires:

December 17, 2005

The permittee is hereby allowed to operate the equipment described herein subject to all terms and conditions of the permit.

6.2 The permittee shall, at all times, maintain and operate the cyclone in accordance with the O&M manual, or as efficiently as practicable. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Department which may include, but is not limited to. monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

[IDAPA 58.01.01.322.01 (state-only), 3/19/99]

Operations and Maintenance Manual

- 6.3 The permittee shall develop an O&M manual within one year of permit issuance. The O&M manual is part of the terms and conditions of the permit
 - The permittee shall update the control device monitoring program in the O&M manual as necessary. The permittee may update the O&M manual at any time during the permit term.
 - The O&M manual shall address the operation, maintenance, and repair of pellet coolers' cyclone to ensure that it is in good working order and operated as efficiently as practicable. The manual shall, at a minimum, include a general description of the control device; normal operating conditions and procedures; startup, shutdown, and maintenance procedures; upset conditions and corrective procedures; methods of preventing malfunctions; appropriate corrective actions to be taken; provisions for monthly inspections during regular operations; and provisions for annual inspections during planned maintenance outages. The permittee shall keep records of maintenance activities in accordance with Permit Condition 1.11.
 - The O&M manual shall include a control device monitoring program that establishes control device operating parameters to be monitored, their acceptable operating ranges, corrective action levels, monitoring equipment and procedures, monitoring frequency, and frequency of recordkeeping. The control device monitoring program shall be developed by the permittee based on compliance test results, vendor data, and other supporting documentation.
 - The O&M manual shall be maintained onsite and made available to Department representatives upon request.
 - Whenever an operating parameter is outside the operating range specified by the control device monitoring program in the O&M manual, the permittee shall take corrective action as expeditiously as practicable to bring the operating parameter back within the operating range. Deviations from the operating range may not by themselves be considered deviations from applicable emissions standards unless the Department determines that the frequency, duration, or magnitude of the deviations indicates that additional action is required. Failure to take corrective action may be considered a violation of this Permit Condition, if appropriate. All deviations shall be reported in accordance with Permit Condition 1.9. [IDAPA 58.01.01.322.01, 3/19/99, IDAPA 58.01.01.322.06, 07, 5/1/94]